STATE OF SOUTH CAROLINA COUNTY OF HAMPTON	) IN THE COURT OF COMMON PLEAS ) CASE NO.: 2017-CP-25-335			
Richard Lightsey, LeBrian Cleckley, Phillip Cooper, et al., on behalf of themselves and all others similarly situated,	, ) ) )			
Plaintiffs,	)			
V.				
South Carolina Electric & Gas Company, a Wholly Owned Subsidiary of SCANA, SCANA Corporation, and the State of South Carolina,	) ) ) ) )			
Defendants,				
South Carolina Office of Regulatory Staff,				
Intervenor.	) )			
THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E				

IN RE:	Friends of the Earth and Sierra Club, Complainant/Petitioner v. South Carolina Electric & Gas Company, Defendant/Respondent	)
IN RE:	Request of the South Carolina Office of Regulatory Staff for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27- 920	)
IN RE:	Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Incorporated for Review and Approval of a Proposed Business	) ) )

Combination between SCANA Corporation	)
and Dominion Energy, Incorporated, as May	)
Be Required, and for a Prudency	)
Determination Regarding the Abandonment	)
of the V.C. Summer Units 2 & 3 Project	)
and Associated Customer Benefits and Cost	)
Recovery Plans	Ó

# CROSS-NOTICE OF VIDEOTAPED DEPOSITION OF KENNETH BROWN

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the South Carolina Rules of Civil Procedure, the South Carolina Office of Regulatory Staff ("ORS), hereby cross-notices the deposition of Kenneth Brown for purposes of the above actions and proceedings. The video deposition of Kenneth Brown will take place before a notary public, videographer, or any other officer authorized to administer oaths, on September 25, 2018 beginning at 10:00 a.m. at the offices of Strom Law Firm, LLC, 2110 N. Beltline Boulevard, Columbia, SC 29204, and will continue on successive days as necessary.

The deposition will be recorded by stenographic and visual means. The deposition is being taken for the purposes of discovery, for use at trial, and for such other purposes as permitted under the South Carolina Rules of Civil Procedure, Court order, and any other applicable rules.

Dated: August 22, 2018

[Signature on following page]

Respectfully submitted,

Matthew T. Richardson (S.C. Bar 15647) Wallace K. Lightsey (S.C. Bar 6476) Camden N. Massingill (S.C. Bar 101319)

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## **CERTIFICATE OF SERVICE**

I, the undersigned attorney of the firm Wyche, P.A., do hereby certify that on the 22nd day of August, 2018, a true and complete copy of Defendants' Cross-Notice of Video Deposition of Kenneth Brown was served via electronic service pursuant to the Case Management Order and sending a copy by U.S. Mail and electronic mail to all counsel of record.

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